

WUSINICH, BROGAN & STANZIONE

Attorneys for Plaintiff

By: Edward C. Sweeney, Esq.

I.D. No.: 64565

537 West Uwchlan Avenue, Suite 200

Downingtown, Pennsylvania 19335

(610) 594-1600

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LEONIDES ROSARIO and LINDA
ROSARIO, h/w
335 S. Prince Street, 3rd Floor
Lancaster, PA 17602

CIVIL ACTION - LAW

No.: 02-CV-3025

Plaintiff,

JURY TRIAL DEMANDED

vs.

SCM GROUP USA, INC.
2475B Satellite Boulevard
Duluth, GA 30096

Defendant.

ORDER

AND NOW this _____ day of _____, 2002, Plaintiff's Motion to Amend Complaint Pursuant to Stipulation between the Parties is hereby GRANTED. It is ORDERED that the Complaint is AMENDED by Stipulation.

BY THE COURT:

J.

WUSINICH, BROGAN & STANZIONE

Attorneys for Plaintiff

By: Edward C. Sweeney, Esq.

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**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LEONIDES ROSARIO and GLENDALIZ
ROSARIO-TORRES, h/w
335 S. Prince Street, 3rd Floor
Lancaster, PA 17602

CIVIL ACTION - LAW

No.: 02-CV-3025

Plaintiff,

JURY TRIAL DEMANDED

vs.

SCM GROUP USA, INC.
2475B Satellite Boulevard
Duluth, GA 30096

Defendant.

**PLAINTIFFS' MOTION TO AMEND COMPLAINT
PURSUANT TO STIPULATION BETWEEN THE PARTIES**

And now comes the Plaintiffs, Leonides Rosario and Glendaliz Rosario-Torres, with this Motion to Amend the Complaint and in support thereof avers as follows:

1. Plaintiffs, Leonides Rosario and Glendaliz Rosario-Torres, are husband and wife and have brought the instant suit in this matter.
2. This matter is a products liability case.
3. Originally, Plaintiff, Glendaliz Rosario-Torres, was named "Linda" in the original Complaint.
4. Both husband and wife in this matter, the Plaintiffs, speak little English and are hard to understand except in Spanish.
5. Through an interpreter, Mrs. Rosario, the wife-Plaintiff, has indicated to Plaintiffs' counsel that her name is not "Linda" but Glendaliz Rosario-Torres.

6. Plaintiffs bring this Motion to Amend the Complaint.

7. Defense counsel has no objection and has signed a Stipulation allowing the Complaint to be amended. See Exhibit "A" attached hereto.

WHEREFORE, Plaintiffs, Leonides Rosario and Glendaliz Rosario-Torres, respectfully request this Honorable Court to issue an appropriate order adopting the Stipulation between the parties.

Respectfully submitted,

WUSINICH, BROGAN & STANZIONE

By: _____
Edward C. Sweeney
Attorney for Plaintiffs

Dated: _____

WUSINICH, BROGAN & STANZIONE

Attorneys for Plaintiff

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Defendant.

CERTIFICATE OF SERVICE

I, Edward C. Sweeney, do hereby certify that I caused a true and correct copy of Plaintiffs' Motion to Amend Complaint Pursuant to Stipulation between the Parties to be sent to the following parties via First Class mail, postage prepaid:

James D. Meadows, Esq.
Meadows Ichter & Bowers, P.C.
8 Piedmont Center, Suite 300
3525 Piedmont Road, N.E.
Atlanta, GA 30305

Warren E. Voter, Esq.
Sweeney & Sheehan
1515 Market Street, 19th Floor
Philadelphia, PA 19102

Respectfully submitted,

WUSINICH, BROGAN & STANZIONE

By: _____
Edward C. Sweeney
Attorney for Plaintiffs

Dated: _____